DIRECT TESTIMONY

of

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Illinois Commerce Commission

Central Illinois Light Company, d/b/a AmerenCILCO,

Central Illinois Public Service Company, d/b/a AmerenCIPS

and

Illinois Power Company, d/b/a AmerenIP

Proposed General Increase in Electric Rates

and

Proposed General Increase in Gas Rates

Docket Nos. 09-0306 - 09-0311 (Cons.)

September 28, 2009

Q. Please state your name and business address.

A. My name is Christopher L. Boggs and my business address is 527 E. Capitol Avenue, Springfield, IL 62701.

Q. By whom are you employed and in what capacity?

A. I am employed by the Illinois Commerce Commission ("ICC" or "Commission") as a Rate Analyst in the Rates Department of the Financial Analysis Division. My responsibilities include rate design and cost of service analyses for electric, gas, water and sewer utilities and the preparation of testimony on rates and rate related matters.

Q. How long have you been employed by the Commission?

A. I have been employed by the Commission since April of 2008.

Q. Please discuss your educational and professional background.

A. I received a BS in Economics/Business Administration from Knox College in 1987. In my work as a Rates Analyst I have testified in several rate cases on issues including tariff language, miscellaneous fees and rates. Prior to my employment at the ICC, I worked more than16 years in mortgage finance and mortgage operations management. I was employed by Illini Bank, Norwest Mortgage, and Illinois National Bank.

Q. What is the purpose of your direct testimony?

A. The purpose of my testimony is to review and make recommendations regarding some of the proposed changes to Central Illinois Light Company's, d/b/a AmerenCILCO ("AmerenCILCO"), Central Illinois Public Service Company's, d/b/a AmerenCIPS ("AmerenCIPS"), and Illinois Power Company's, d/b/a AmerenIP ("AmerenIP") (individually, the "Company" and collectively, the "Companies" or "Ameren") miscellaneous fees and charges and tariff language.

Q. Whose testimony for the Companies did you review?

A. I reviewed the testimony of the Companies' witness Peter Millburg (Ameren Ex.17.0G (Revised)).

Q. How is your testimony organized?

A. For each Company, I first address the various language changes contained in the Customer Terms and Conditions sections of its tariffs. I then address changes in the Standards and Qualifications sections and finally changes in the Miscellaneous Fees and Charges sections.

Customer Terms and Conditions

Q. Please discuss the first change that the Companies propose to the Customer Terms and Conditions section of their respective tariff books.

A. In subsection 10, the "Switching Suppliers" heading of each respective Companies' tariff book, there are date changes, wording additions and deletions proposed by the Companies regarding the timing of the customer's written notice that is required to switch between gas transportation service and Company supplied gas service, and the effective dates of when service is supplied.

Q. Do you recommend approval of the wording modifications and date changes in the "Switching Suppliers" subsections?

A. Yes. The modifications provide clear guidelines as to when notifications are due and when the service is supplied or suspended for customers requesting conversion between company supplied gas service and gas transportation service.

Q. Please discuss the next change to the Customer Terms and Conditions section of the Companies' tariff books.

A. Under subsection 12, “Disconnection and Reconnection,” each Company has added the word “or” to the end of situation No. 4 and inserted an additional situation (No. 5) that would allow the Company the right to discontinue service to any customer. That situation reads as follows:

> “Upon failure of a customer to provide access to meter when Company is conducting a Pipeline Safety Survey.”

Also, each Company has added a paragraph at the end of the subsection that reads:

> “When Company has taken action which results in service being physically cut at or near the main due to inability to gain access to metering equipment for disconnection purposes, Customer shall pay the Physical Service Reconnection Charge provided for in the Miscellaneous Fees and Charges tariff. Work associated with the physical service reconnection will only be performed during regular working hours.”

The additional language places the financial responsibility for reconnection on the customers who have caused the need for such action.

Q. Please discuss the fee proposal that has been added to the Companies’ Miscellaneous Fees and Charges tariff that relates to the reconnection of service.

A. The Companies propose to add a $400 charge for reconnecting customers whose service was disconnected at the main because access to the meter was blocked. In his testimony (Ameren Exhibit 17.0G (Revised)), at lines 297-302, Mr. Millburg explains that occasionally the Companies experience situations where customers are reluctant, or refuse, to provide employee access to their meters which typically commence when the Companies' employees arrive to turn off the gas service due to bill non-payment. Also, according to Mr. Millburg, oftentimes these meters are either located in the customer's house, or outdoors where the employees may not have safe access to perform the disconnection. The Company's field technicians will make 2 on-site attempts to access the meter and will leave door hangers instructing the customers to call the Company to make access arrangements.

Q. What is the basis for the Companies' $400 fee proposal for customers whose service has been disconnected at the main because access to the meter was blocked?

A. In response to Staff Data Request ("DR") CB 1.03, Mr. Millburg states "Digging to gas mains for disconnection/reconnection purposes requires a two-person crew and takes approximately 1.5 hours for set-up, digging, work on the physical facilities, backfilling the excavation and tear-down." He indicates that the job is a two-part process: Once to go out to disconnect the service and again to go out to reconnect. According to Mr. Millburg, the Gas Journeyman wage rate is $161.36 per hour and the 2 jobs would take approximately 3 hours to complete for a total of $484.03.

The Companies would like to use the $400 fee as a deterrent to customers who might block access to their meters from Company employees who are there to disconnect service.

Q. Do you recommend approval of the $400 fee the Companies are proposing for customers whose service has been disconnected at the main because access to the meter was blocked?

A. Yes. Many times customers who have had their service disconnected for failure to pay their gas bills will want service restored when it is financially feasible to do so. According to the Companies' response to Staff DR CB 4.02, when a customer blocks access to the meter the Companies ultimately send a letter to the customer explaining that it will have to disconnect service at the main if the customer continues to block access to Company employees and addresses the fees and back pay that would be required to reconnect service. The $400 reconnection fee would act as an effective deterrent because it would add to the amount the customer would owe to have service reconnected.

Q. Do you recommend approval of the additions that the Companies have proposed for the "Disconnection and Reconnection" subsection in the Customer Terms and Conditions section?

A. Yes, the additions are reasonable. The additions clarify procedures and demonstrate where the financial responsibility lies when disconnection/reconnection of service is required. Moreover, the proposed $400 fee for reconnection is reasonable because as illustrated earlier in this testimony, the total cost to the Companies for reconnecting service has been documented at $484.03.

Q. Please discuss the next change to the Customer Terms and Conditions section of the Companies' tariff books.

A. The Companies propose to change the label of "Customer Charge" to "Fixed Monthly Charge" on both the Gas and Electric customer bills.

Q. What is the reason given for the Companies' proposal to change the Customer Charge label on the bill?

A. In his direct testimony (Ameren Exhibit 17.0G (Revised)), at lines 174-179, Mr. Millburg indicates that the label change should aid in customers' understanding of the bill component and the role the charge plays in supporting the Companies' fixed costs for its gas systems operations. Mr. Millburg further explains in his response to Staff DR CB 4.03 that when the Companies try to explain to a customer what a "Customer Charge" is, customer service representatives anecdotally describe it as "a fixed monthly charge that does not change with monthly usage."

According to Companies witness Leonard Jones, "For bill presentation purposes, the AIUs propose that the Customer and Meter Charges be combined and shown on customer bills as “Fixed Monthly Charge.” (Ameren Exhibit 16.0 E (Revised), p. 17) Mr. Jones provides neither additional comments nor reasons why the change to a Fixed Monthly Charge label should be made.

Q. Do you recommend approval of the proposed change to the Customer Charge label on the bill for Gas and Electric customers?

A. No, I do not. I believe that a change to the “Customer Charge” label describing it as a “Fixed Monthly Charge” would be more confusing to customers because the monthly charge will change from time to time due to charges that are, and will be, added to the Delivery Services customer charge. The charge may not always change monthly, but it will change, nonetheless.

For example, the Renewable Energy Resources and Coal Technology Development Assistance Charge and the Energy Assistance Charge for the Supplemental Low-Income Energy Assistance Fund are currently included in the Customer Charges for both electric and gas customers. Prior to August 2009, the Energy Assistance Charge for electric and gas was $.40, $4.00 and $300.00 per month for residential, commercial and industrial customers, respectively. Beginning in August 2009, those charges respectively changed to $.48, $4.80 and $360.00.

Additionally, Ameren has filed for a new Rider EUA – Electric Uncollectibles Adjustment and a new Rider GUA – Gas Uncollectibles Adjustment pursuant to newly enacted state law. The charges for these new riders will be added to, and included in, the Customer Charge on the bills of customers. These uncollectibles charges have the potential to change 2 or 3 times per year; thus, changing the Customer Charge 2 or 3 times per year. With these kinds of changes, it hardly fits the definition of a 'fixed' monthly charge. Further, it will be incorrect for Ameren's customer service representatives to describe the Customer Charge as a "fixed monthly charge" in the future.

Therefore, under the Companies' proposal customers are less likely to understand why their "Fixed Monthly Charge" varies over time and what that charge represents.

Q. Please discuss the next proposed change to the Customer Terms and Conditions section that applies to only AmerenCILCO.

A. Because AmerenCILCO proposes to eliminate Rate GDS (Gas Delivery Service)-6, Large Volume Gas Delivery Service, the Company also proposes to eliminate references to GDS-6 throughout the Customer Terms and Conditions section of the tariff.

Q. Do you recommend approval of the proposal to eliminate the references to GDS-6, if the Commission approves the elimination of GDS-6?

A. Yes, if the Commission approves the elimination of Rate GDS-6, all references to it should be eliminated. Also, AmerenCILCO should eliminate the reference to GDS-6 in paragraph 6A, Gas Delivery Service Rates, as it appears that there was an oversight by the Company to eliminate the GDS-6 reference in that particular paragraph.

Q. Please summarize your recommendations under the Customer Terms and Conditions section.

A. I recommend the Commission approve the following:

1. The Companies' proposed wording modifications and date changes in the "Switching Suppliers" subsections;

2. The Companies' proposed $400 fee for customers whose service has been disconnected at the main because access to the meter was blocked;

3. The Companies' proposed language changes in the "Disconnection and Reconnection" subsection; and

4. AmerenCILCO's proposal to eliminate the references to GDS-6, if the Commission approves the elimination of GDS-6 for AmerenCILCO.

I also recommend that the Commission reject the Companies' proposal to change the Customer Charge label on gas and electric customer bills to "Fixed Monthly Charge."

<u>Standards and Qualifications for Gas Service</u>

Q. Please discuss the changes proposed by the Companies in the Index subsection of the Standards and Qualifications for Gas Service sections of their tariffs.

A. The first changes are to the Index subsection of the Standards and Qualifications for Gas Service sections of the Companies' tariffs. The Companies have proposed certain word deletions and additions to conform to some subsequent section changes in their tariffs. Also, each Company is updating the page numbers of where to find those sections in the tariffs.

Q. Do you recommend approval of the word additions/deletions and page updates in the Index subsection of the Companies' respective tariffs?

A. Yes, the modifications are necessary for a reader to be able to effectively navigate the Standards and Qualifications for Gas Service section of the Companies' respective tariffs.

Q. Please discuss the next change that the Companies propose in the Standards and Qualifications section.

A. The next change that the Companies propose is in the Service Extension paragraph which indicates that a residential customer will be provided up to 60 feet of 1 inch polyethylene service pipe at no charge. If the service extension required is longer than the free footage allowance, or the required pipe is larger than 1 inch, the Companies' tariffs currently require the customer to pay the difference through a non-refundable contribution in advance of construction. The Companies propose to eliminate the words "in advance of construction," from the Service Extension paragraph.

Also, Ameren IP's tariff has an additional sentence in the Service Extension paragraphs for both residential and non-residential customers which states: "Customer shall also pay in advance a pro rata share of the cost of connection with the Company's existing facilities." The Company is proposing to remove this sentence.

Q. Why are the Companies proposing to eliminate the phrase "in advance of construction"?

A. In his direct testimony (Ameren Exhibit 17.0G (Revised)), at lines 318-333, Mr. Millburg states that on the rare occasions when residential service installations exceed the free footage allotment, the overruns typically can not be predicted and are for minimal amounts. If the Companies are allowed to remove the phrase "in advance of construction," the customer would be able to use the gas service immediately after construction and it would reduce the need for the

Companies' service employees to make a return trip to the construction site to turn on service.

Q. Do you recommend approval of the Companies' proposal to eliminate the phrase "in advance of construction" from the Service Extension paragraph under the Standards and Qualifications for Gas Service section?

A. Yes. By removing the requirement of the customer having to pay for service installation that exceeds the free footage allotment "in advance of construction," the customer would be able to use the service more expeditiously and it would eliminate the Companies' need to return to the site to turn on the service after it was paid. This would allow for a more efficient process.

Q. Why is AmerenIP proposing to eliminate the sentence "Customer shall also pay in advance a pro rata share of the cost of connection with the Company's existing facilities" from its Service Extension paragraphs?

A. AmerenIP historically used a provision called a "gas main tapping fee" that allowed the Company to recover a substantial portion of the up front connection costs from customers or developers requesting new gas service. According to Mr. Millburg (Ameren Ex. 17.0G (Revised), lines 279-293), the fee primarily affected developers constructing new houses and, to a lesser extent, was used as a persuasive measure to incent customers with inside or inaccessible meters to allow Company workers access to these meters for disconnection purposes. Mr. Millburg states that AmerenIP has determined that this “gas main tapping” fee constituted an unnecessary barrier that possibly could prohibit development within its service territories.

Q. Do you recommend approval of the Companies’ proposal to eliminate the sentences and phrases in the Service Extension paragraph?

A. Yes. Eliminating this “gas main tapping fee” allows AmerenIP the opportunity to create some uniformity between all of the Companies’ Standards and Qualifications for Gas Service tariffs and potentially promotes development of real estate without unnecessary barriers to developers.

Q. Do the Companies propose any changes to the Metering subsections of their respective tariffs?

A. Yes, under subheading “B”, Request for Interval Metering, the Company proposes to delete and add wording.

First, the Companies propose to delete the words “Request for” from the subheading so that the revised subheading paragraph title reads, “Interval Metering.”

Second, the Companies propose to add two sentences to the paragraph under the subheading. The sentences to be added are:

> "The Company will install an interval meter at each location where the Customer receives gas delivery service under rate GDS-4, GDS-5, or GDS-7."

and

> "Whenever interval metering is installed, the Company will own, furnish, install, calibrate, test, maintain, and read meters used for billing and settlement purposes."

The Companies also propose to delete the following three sentences from the same paragraph.

> "A Customer may request that interval metering equipment be installed for Customer by the Company at the Customer's expense. In this case, Company will own, furnish, install, calibrate, test, maintain and read meters used for billing and settlement purposes. The charge associated with the incremental cost of interval metering shall be determined pursuant to the Excess Facilities section of Standards and Qualifications for Gas Service."

Q. What reasons do the Companies provide for their proposal to add and delete tariff language?

A**.** Mr. Millburg states that the Companies will now automatically install Interval Metering for rate classes GDS-4, GDS-5 and GDS-7 so that customers in these classes no longer will have the need to specifically request Interval Metering from the Companies.

Q. What is Interval Metering?

A. Interval meters convert the meter device's data into an electronic format, correlate that data to the dates and times of usage, and then store the data until it can be discerned by the Company's meter reading system. Daily usage measurements are then used by the Company so that the respective customers can be billed properly. According to Mr. Millburg's response to Staff DR CB 4.01, interval meters allow GDS-4 and GDS-7 customers, who transport their own gas, to balance their supply and usage on a daily basis. It further benefits customers by enabling those customers to stay within delivery and usage parameters and avoiding possible imbalance penalties from their suppliers. The Companies are also able to accurately bill GDS-5 customers who are charged when the outside temperature is forecast to be 25 degrees Fahrenheit or less.

Q. Do you recommend approval of the Companies' proposed language additions and deletions to this Metering subsection paragraph?

A. Yes. The Companies propose to automatically install Interval Metering for rate classes GDS-4, GDS-5 and GDS-7. Customers in these classes would no longer need to request Interval Metering from the Companies in order to obtain its benefits.

Q. Please discuss the next series of changes the Companies propose under the Standards and Qualifications for Gas Service section.

A. The Companies propose to change the subsection heading under section C from “Interval Metering Facilities” to “Daily Usage Information Service” along with numerous proposed language changes and deletions to better illustrate what the revised subsection entails. Following is a list of the proposed modifications in the order they appear in this tariff section.

First, the Companies propose to add two clauses directly under the proposed new subheading:

> “The Company will provide Daily Usage Information Service as follows:
>
> Customer receiving gas Delivery Service under Rate GDS-4 or GDS-7:”

Next, the first paragraph has been modified to read (additions underlined; deletions in strikeout):

> “In order to facilitate remote interrogation of interval metering by the Company and provide daily usage information to Customer, the Company will install a remote monitoring device at each interval meter location where Customer receives gas delivery service under Rate GDS-4 or GDS-7**.** ~~and receives gas supply service under Rider T or Customer receives gas delivery service under Rate GDS-7 and receives gas supply service under Rider S.~~”

The second paragraph has been modified to read (additions underlined; deletions in strikeout):

> "For each remote monitoring device, the Customer, at the Customer's expense, shall provide access to a commercial telephone line and 120 volt AC electric power at a location designated by the Company. The telephone line shall be dedicated for Company's use. ~~Metering equipment will not be installed by the Company until the required phone line and electrical connections are available.~~"

A third paragraph has been added that reads:

> "If a customer does not provide access to a commercial telephone line and 120 volt AC electric power at a location designated by the Company, or, if interrogation is not possible due to a telephone service outage, Company will dispatch technicians each month with specialized equipment to capture the daily usage information necessary to bill Customer. The charge to the Customer for such meter read will be $170 for each occurrence."

The fourth paragraph has been modified to read (additions underlined; deletions in strikeout):

> "If phone line is installed and Company is unable to retrieve daily usage information it will be the Customer's responsibility to verify that the Customer's phone line is in working condition. In addition, Company reserves the right to charge Customers for each service call to investigate ~~or repair~~ the remote monitoring ~~recording device~~ if such service call is the sole result of telephone service outage. ~~If frequent or prolonged telephone service outages occur, Company, at its sole discretion, shall have the right to have the phone line repaired and charge Customer for repairs.~~"

Finally, the Companies have proposed to add seven additional paragraphs under subsection C, Daily Usage Information Service subheading that read:

"Customers receiving gas Delivery Service under Rate GDS-2, GDS-3 or GDS-5:

A Customer receiving gas Delivery Service under Rate GDS-2, GDS-3 or GDS-5 may elect to receive Daily Usage Information Service. A Customer electing such service shall be billed the monthly charge shown immediately below for each meter for which Customer has elected to receive Daily Usage Information Service.

Monthly charge for Daily Usage Information Service $5.00 per meter

If Customer elects such service, the Company may be required to install a remote monitoring device to provide daily usage information to Customer. If Company is required to install a remote monitoring device in order for Customer to receive Daily Usage Information Service, Customer will be required to pay Company $2,400 prior to receiving service, for each meter where a remote monitoring device is required, to cover the cost of equipment and installation.

For each remote monitoring device, the Customer, at Customer's expense, shall provide access to a commercial telephone line and 120 volt electric power at a location designated by the Company. The telephone line shall be dedicated for Company's use. If Customer is located in an area where the Company has AMR (Automated Meter Reading) installed and Company is not required to install a remote monitoring device to obtain daily usage, Customer will not be required to install a commercial telephone line or 120 volt AC electric power, nor will they be assessed the monthly charge for Daily Usage Information Service.

> If Company is required to install a remote monitoring device and Customer does not provide access to a commercial telephone line and 120 volt AC electric power or, if interrogation is not possible due to a telephone service outage, Company will be unable to provide daily interval usage information to Customer until Customer installs the necessary equipment or rectifies the phone outage. If phone line is installed and Company is unable to retrieve daily usage information it will be the Customer's responsibility to verify that the Customer's phone line is in working condition.
>
> In addition, Company reserves the right to charge Customers for each service call to investigate the remote monitoring device if such service call is the sole result of telephone service outage."

Q. What reasons do the Companies provide for their proposal to modify tariff language under section C of the Standards and Qualifications for Gas Service?

A. The Companies propose to modify the tariff language in section C to clarify the process of the Daily Usage Information Service. In response to Staff DR CB 3.01, Mr. Millburg indicates that the Companies need to have daily usage information available for processing and billing on the first day of each month to comply with gas industry billing standards, minimize pipeline imbalance charges, and minimize costly on-site meter reads. Mr. Millburg also indicates that the Companies need to have a real-time understanding of usage by their largest customers to make the best decisions for the operational reliability and integrity of the system.

Q. Do other Staff witnesses address this issue?

A. Yes. Staff witness Sackett (ICC Staff Exhibit 14.0) discusses the historical perspective of the issue.

Q. Do you recommend approval of the Companies' proposals to modify tariff language under section C of the Standards and Qualifications for Gas Service?

A. Yes. The proposed revised section clarifies the process and equipment the Companies require for providing Daily Usage Information Service.

Q. Please discuss the next change the Companies propose under the Standards and Qualifications for Gas Service section.

A. In his testimony, Mr. Millburg (Ameren Exhibit 17.0G (Revised), lines 200-205) discusses that customers in the GDS-2 and GDS-3 rate classes no longer require a real-time data connection to their meter due to the characteristics of these customers' usage and the monthly balancing provisions. He indicates that the Companies' proposal would eliminate potential significant costs for customers in the GDS-2 and GDS-3 rate classes that seek to access transport gas because installing telephone lines could offset some of the gas commodity savings that these customers might otherwise experience.

Q. Are there some GDS-2 and GDS-3 customers that would like to continue to access daily usage information through the Companies' Unbundled Services Management System?

A. Yes. Mr. Millburg further discusses (Ameren Exhibit 17.0G (Revised), lines 206-211) that the Companies have no objection to the customer's requests to access the daily usage information and the Companies have established standard daily data access fees and charges that reflect the costs of modifying existing metering equipment that allow the capability of transmitting the daily meter information.

Q. Please discuss the standard daily data access fees and charges that the Companies will require which allow the capability of existing metering equipment GDS-2 and GDS-3 customers have to transmit daily meter information.

A. In his testimony (Ameren Exhibit 17.0G (Revised), at lines 211-213, Mr. Millburg initially indicated that the cost of the installation of a modem and associated equipment required to host the modem would cost a customer a one-time charge of $2,400 and a monthly fee of $5.00. When asked to break down the charges through Staff DR CB 1.01, Mr. Millburg replied that he learned the equipment costs used in preparing the one-time charge were outdated and incorrect. Mr. Millburg maintained that in order to collect, store and communicate the usage data from the gas meter into the Unbundled Services Management System (USMS) on a daily basis, the following auxiliary equipment would need to be installed on the meter:

> "If the meter lacks an electronic pressure corrector, a pulse accumulator would need to be installed. The pulse accumulator receives the usage information from the meter, converts it into electronic data, and stores the usage data at the meter until the remote inquiry is made through its built-in modem; or If the meter already has an electronic pressure corrector installed, a stand-alone modem must be added to transmit the stored usage data to the USMS."

According to the information that Mr. Millburg supplied, the installation charges for meters without an Electronic Pressure Corrector - Pulse Accumulator amounts to $1,944. The installation charges for meters already equipped with an Electronic Pressure Corrector - Stand-alone Modem amounts to $812.25.

Mr. Millburg also supplied data that illustrated the monthly fee to collect the daily usage data by calling the modems at each meter from Unbundled Services Management System (USMS). This data yielded a monthly cost to the Company of $4.95 based on a 30-day month.

Q. What is your recommendation regarding the fees for optional daily access to metered usage through the Companies' USMS?

A. I recommend approval of the Companies' proposal to charge customers who desire daily access to metered usage through USMS a one time fee of $1,944 when the Companies have to install an Electronic Pressure Corrector - Pulse Accumulator. Based on the information that Mr. Millburg provided in his response to Staff DR CB 1.01, this fee is equal to the materials and labor charge that would be incurred by the Companies multiplied by the excess facilities charge (1.9 times the labor and materials charge). An excess facilities charge applies because this equipment is not used to gather meter data for billing delivery service or supply service for smaller volume gas customers.

I also recommend approval of the Companies' proposal to charge customers a one time fee of $812.25 when they need to install a Stand-alone Modem. Based on the information that Mr. Millburg provided in his response to Staff DR CB 1.01, this fee is equal to the materials and labor charge that would be incurred by the Companies multiplied by the excess facilities charge.

Finally, I recommend approval of the Companies' proposed $5.00 monthly fee assessment to customers for collecting the daily usage data by calling the modems at each meter from the USMS. Based on the information that Mr. Millburg provided in his response to Staff Data Request 1.01, it takes an average of five minutes for the data to be transferred from the meter and uploaded into

USMS. The Companies' current long-distance charges are 3.3 cents per minute. An average of 30 (one per day) calls per month, averaging five minutes per call at 3.3 cents per minute equals $4.95, which is rounded up to $5.00 for inclusion in this tariff.

Q. Please summarize your recommendations under the Standards and Qualifications section.

A. I recommend the Commission approve the following:

1. The Companies' proposal of the word additions/deletions and page updates in the Index subsection of the Companies' respective tariffs;

2. The Companies' proposal to eliminate certain sentences and phrases in the Service Extension paragraph including ones exclusive to Ameren IP;

3. The Companies' proposed language additions and deletions to the Interval Metering subsection paragraph;

4. The Companies' proposals to modify tariff language under section C of the Standards and Qualifications for Gas Service;

5. The Companies' proposal to charge customers who desire daily access to metered usage through USMS a one time fee of $1,944 when the Companies have to install an Electronic Pressure Corrector - Pulse Accumulator; and

6. The Companies' proposed $5.00 monthly fee assessment to customers for collecting the daily usage data by calling the modems at each meter from the USMS.

<u>Miscellaneous Fees & Charges</u>

Q. Please discuss the remaining fee proposal that has been added to the Companies' Miscellaneous Fees and Charges tariff.

A. The Companies propose to add a fee for a non-scheduled meter read for customers whose tariffs require operable telephone lines to their gas meters. The Companies currently require only GDS-4, GDS-6 and GDS-7 customers to install telephone lines that allow for remote reads of their meters by the USMS. The meters for the customers in these rate classes are therefore removed from the scheduled meter read routes. If customers in these rate classes fail to have the required telephone lines installed or fail to have the lines repaired when they become inoperable, the Companies propose to assess a $170 fee to have a technician come out to read the meter with specialized equipment and download the data in order to properly bill these accounts and determine compliance with the provisions of the tariff.

Q. What is the basis of the Companies' $170 fee proposal for these non-scheduled meter reads?

A. In response to Staff DR CB 1.02, Mr. Millburg states that the fee is equal to the hourly productive wage rate to have a technician travel to and from the site to upload the meter data into the laptop computers required to store hourly meter data. Because the customer would be in non-compliance with the tariff provisions, the fee is used to act as a deterrent to non-compliance rather than the alternative disconnection notice.

Q. Do you recommend approval of the $170 non-scheduled meter read for customers in the GDS-4, GDS-6 and GDS-7 rate classes?

A. Yes. The $170 fee is based on the cost to be incurred by the Companies and would effectively act as a deterrent to non-compliant customers and mitigate more costly disconnect and reconnection fees. The technicians that would be required for non-scheduled meter reads could be more efficiently used for maintenance and/or new customer meter installation.

Q. Does this conclude your prepared direct testimony?

A. Yes, it does.